

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,
ex rel. ALEX DOE, Relator,

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THE STATE OF TEXAS,
ex rel. ALEX DOE, Relator,

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THE STATE OF LOUISIANA,
ex rel. ALEX DOE, Relator,

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Plaintiffs,

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§
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v.

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Civil Action No. 2:21-CV-00022-Z

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PARENTHOOD SOUTH TEXAS,
INC., PLANNED PARENTHOOD
CAMERON COUNTY, INC.,
PLANNED PARENTHOOD SAN
ANTONIO, INC.,

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Defendants.

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PLAINTIFFS' DESIGNATION OF TESTIFYING EXPERT WITNESS

Pursuant to the Scheduling Order (Dkt. 72), Plaintiffs hereby file their Designation of Testifying Expert Witness in the above-captioned case as follows:

RETAINED EXPERT

Donald E. Lochabay, Jr., CMA
Managing Director
Alvarez & Marsal Disputes and Investigations
2100 Ross Avenue
21st Floor
Dallas, Texas 75201
(214) 438-8440

A detailed description of the opinions Mr. Lochabay will offer, and the bases for same, is contained in the Expert Report of Donald E. Lochabay, Jr., which are being served on Defendants today in accordance with Federal Rule of Civil Procedure 26(a)(2)(B).

Plaintiffs further reserve the right to designate rebuttal experts pursuant to ¶ 5 of Scheduling Order and any amendments thereto. Plaintiffs further reserve the right to supplement and/or amend these designations, if necessary, in response to additional information and discovery, pursuant to the Federal Rules of Civil Procedure.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN E. COWLES
Deputy Attorney General for Civil Litigation

/s/ Raymond Charles Winter
RAYMOND CHARLES WINTER
Chief, Civil Medicaid Fraud Division
Texas Bar No. 21791950

AMY S. HILTON
Assistant Attorney General
State Bar No. 24097834

Office of the Attorney General
General Litigation Division
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
(512) 463-2120 / Fax (512) 320-0667
Raymond.Winter@oag.texas.gov
Amy.Hilton@oag.texas.gov

ATTORNEYS FOR THE STATE OF TEXAS

/s/ Andrew B. Stephens
ANDREW B. STEPHENS
Texas Bar No. 24079396
HEATHER GEBELIN HACKER
Texas Bar No. 24103325

HACKER STEPHENS LLP
108 Wild Basin Road South, Suite 250
Austin, Texas 78746
(512) 399-3022
heather@hackerstephens.com
andrew@hackerstephens.com

ATTORNEYS FOR RELATOR

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was filed electronically via CM/ECF on July 1, 2022, causing electronic service on all counsel of record.

/s/ Raymond Charles Winter
Raymond C. Winter